

EXHIBIT 4

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July 1, 2013

VIA E-MAIL

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RE: *In re: Ethicon, Inc. Pelvic Repair System*
Products Liability Litigation MDL No. 2327

Dear Christy:

I write in response to your recent letter regarding the ongoing issues regarding document production, and your revised discovery responses. We have reviewed those responses and objections carefully, but given all of the problems with the production to date and the fact that many of your client's objections (including those asserted in the most recent responses) may have already been waived, we need to move forward with a hearing on our motion to compel. We are available either by phone or in person for this hearing. Given all of the upcoming depositions and other deadlines, we need to have this issue heard as soon as possible. Perhaps if we do that hearing in person we can meet immediately thereafter as to the remaining outstanding requests.

Regards,

Bryan Aylstock

cc: Tom Cartmell (via email)
Renee Baggett (via email)
Ben Watson (via email)